

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DREW J. RIBAR,
Plaintiff,
v.
WASHOE COUNTY, et al.,
Defendants.
Case No.: **3:24-cv-00526-ART-CSD**

**NOTICE OF ERRATA REGARDING PLAINTIFF'S OPPOSITION TO
TEMPORARY RESTRAINING ORDER (ECF No. 176)**

Plaintiff **Drew J. Ribar**, appearing pro se, respectfully submits this **Notice of Errata** to correct a
typographical citation error contained in Plaintiff's **Opposition to Temporary Restraining
Order** (ECF No. 176), filed on October 31, 2025.

I. IDENTIFICATION OF ERROR

On **Page 4** of the Opposition, in the **table entry referencing Exhibits 6 and 11**, the citation:

"100% protected speech and petitioning activity (BELO Corp. v. Leath, 499 U.S. 340)"

was inadvertently included in error. The case cited does not pertain to First Amendment
protections or legal petitioning activity.

II. CORRECTION

The correct citation to support the First Amendment protection for public complaints to government and disciplinary agencies is:

"Fully protected First Amendment petitioning activity (McDonald v. Smith, 472 U.S. 479, 483 (1985); Jacobs v. Adelson, 130 Nev. 134, 141, 321 P.3d 467, 472 (2014))"

III. LEGAL BASIS FOR CORRECTION

- **McDonald v. Smith**, 472 U.S. 479, 483 (1985):

The U.S. Supreme Court held that letters to government officials (in that case, accusing a U.S. Attorney of favoritism) are **core First Amendment petitioning activity**, and entitled to full constitutional protection.

- **Jacobs v. Adelson**, 130 Nev. 134, 141, 321 P.3d 467, 472 (2014):

The Nevada Supreme Court confirmed that complaints to **disciplinary or prosecutorial agencies** (such as the **State Bar or DA's Office**) are made in **quasi-judicial proceedings** and are **absolutely privileged** under Nevada law.

IV. EFFECT ON MOTION

This correction does **not alter the substance** or argument of the Opposition. The point remains that Plaintiff's bar complaints and communications regarding public officials are **fully protected**

PLEADING TITLE - 2

1 **by the First Amendment and immune from civil liability** under well-settled federal and state
2 law.

3
4 Plaintiff apologizes for the citation error and thanks the Court for its understanding.
5

6
7
8 **DATED:** October 31, 2025

9 Respectfully submitted,

10
11 **/s/ Drew J. Ribar**

12 Drew J. Ribar, Pro Se

13 3480 Pershing Ln.

14 Washoe Valley, NV 89704

15 Const2Audit@gmail.com

16
17 (775) 223-7899
18

1 **CERTIFICATE OF SERVICE**

2
3 I certify that on October 31, 2025, I caused a true and correct copy of the foregoing **Notice of**
4 **Errata** to be served via email to:

5
6 **Lindsay Liddell**

7
8 **Alison Kertis**

9 Washoe County District Attorney's Office

10 lliddell@da.washoecounty.gov

11 akertis@da.washoecounty.gov

12
13 And by email to the United States District Court Clerk:

14 reno_public_docketing@nvd.uscourts.gov

15
16 **/s/ Drew J. Ribar**

17 Drew J. Ribar, Pro Se